

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK X

PAUL THOMPSON,

Plaintiff,

-against-

CORPORATION COUNSEL, et al.,

Defendants. X

MOTION FOR
AN ORDER
COMPELLING
DISCOVERY

CHAMBERS OF
JUDGE ROBERT E. PATTERSON

APR - 7 2008

07 Civ. 2831(RPP)

MEMO ENDORSED

Plaintiff move this court for an order pursuant to Rule 37(a) of the Federal Rules Of Civil Procedure compelling defendants Department of Correction and/or Corporation Counsel to produce for inspection and copying the following documents: (see attached request). Plaintiffs submitted a written request for these documents, pursuant to Rule 34 of the Federal Rules of Civil Procedure on: February 26, 2008 but have not yet received the documents.

Plaintiff also move for an order pursuant to Rule 37(a)(4) requiring the aforesaid Defendants to pay Plaintiff the sum of \$150.00 (one hundred fifty dollars) as reasonable expenses in obtaining this order, on the ground that the defendants refusal to answer the and/or produce the documents had no substantial justification.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/9/08

DATED: 3/31/08

SIGNED: *Paul Thompson*

P. Thompson Pro Se
Box 51 G.M.C.F.
Comstock, N.Y. 12821

*Application
Denied without
prejudice.
So ordered
Rox P. Patterson
vsd
4/8/08*

SWORN TO ME ON THIS
31st DAY OF March 2008

Curtis F. Poirier

CURTIS F. POIRIER
Notary Public, State of New York
Qualified in Warren County
No. 01PO6122732

Commission Expires February 22, 2009

C/C A. Okereke
corp. counsel

AFFIDAVIT OF SERVICE

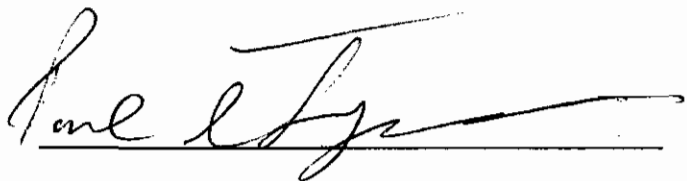
STATE OF NEW YORK)
) ss.:
COUNTY OF WASHINGTON)

I, PAUL THOMPSON, being duly sworn, depose and say
that on the 31 day of March, 2008,
Petitioner/Defendant/Claimant, served upon the defendant/
respondent the annexed document(s) identified as:
ORDER TO COMPEL (document[1st]), upon the following party:

U.S.D.J. PATTERSON JR.
Chambers
UNITED STATES DISTRICT COURT
500 PEARL ST.
NEW YORK, N.Y. 10007

AMY OKEREKE ESQ.
CORP. COUNSEL
DEPT. OF LAW
100 Church st. Rm 3-137
NEW YORK, N.Y. 10007

by placing the same in a mailbox at the Great Meadow Correctional
Facility, under the exclusive care and custody of the united
States Postal Service, by regular first class mail/certified
return receipt mail/other.



Sworn to before me this

31st day of March, 2008


NOTARY PUBLIC

CURTIS F. POIRIER
Notary Public, State of New York
Qualified in Warren County
No. 01PO6122732
Commission Expires February 22, 2009

UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK x

PAUL THOMPSON,
Plaintiff

-against-

CORPORATION COUNSEL, et al.,
Defendants.

PLAINTIFF'S
SECOND REQUEST
FOR PRODUCTION
OF DOCUMENTS
07CIV.2831(RPP)

Pursuant to Rule 34 of the Federal Rules of Civil Procedure,
Plaintiff request that Defendants Department of Correction produce
for inspection and copying the following documents:

1. The complete work records involving use of force from all
Defendants whose title include Correction Officer, Captain, Deputy
Warden and/or any other capacity.
2. Any and all rules, regulations, and policies of the New York Dept.
of Corrections about Central Montoirng Cases (inmates) movement
, and housing.
3. Any and all rules, regulation, and policies of the New York Dept.
of Corrections about Central Monitoring Case Inmates movement
when being transported outside their housing area to recreation,
services, and visits; who is suppose to escort Inmates?
4. Any and all rules, regulation, and policies in New York Dept.
Of Correction about the use of elevators by inmates, Officers
, and civilians; any special procedures set for Central
Monitoiring Case Inmates etc.
5. Any and all documents involving Plaintiff's complaints to the
Board of Correction from January of 2007 to date of said incident,
February 10, 2007.

SINCERELY YOURS,


P. THOMPSON

SWORN TO ME ON THIS
26 DAY OF February 2008



CURTIS F. POIRIER
Notary Public, State of New York
Qualified in Warren County
No. 01PO6122732

Commission Expires February 22, 2009

AFFIDAVIT OF SERVICE

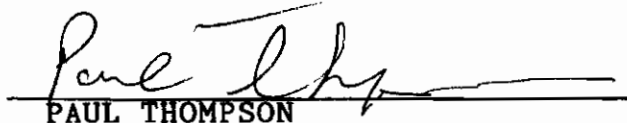
STATE OF NEW YORK)
) ss.:
COUNTY OF WASHINGTON)

I, PAUL THOMPSON, being duly sworn, depose and say
that on the 26 day of FEBRUARY, 2008,
Petitioner/Defendant/Claimant, served upon the defendant/
respondent the annexed document(s) identified as:
2nd request for documents, upon the following party:

AMY N. OKEREKE
100 CHURCH ST. DEPT. OF LAW
NEW YORK, N.Y. 10007

JUDGE ROBERT P. PATTERSON JR.
U.S.D.J.
500 PEARL STREET
NEW YORK, N.Y. 10007

by placing the same in a mailbox at the Great Meadow Correctional
Facility, under the exclusive care and custody of the united
States Postal Service, by regular first class mail/certified
return receipt mail/other.


PAUL THOMPSON

Sworn to before me this

26 day of February, 2008


NOTARY PUBLIC

CURTIS F. POIRIER
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No. 01PO6122732
Commission Expires February 22, 2009